

Consolidated Plan (ConPlan) Improvement Initiative

County Working Group

Summary of Ideas

The purpose of this submission is to summarize the meaningful ideas generated by the County Working Group as part of the ConPlan Improvement Initiative (CPII). These ideas will be forwarded to the CPII Steering Committee. The Final Report summarizing the ideas from the various CPII Working Groups will be shared with the Assistant Secretary of Community Planning and Development for consideration and possible action. These ideas relate to changes that may be administrative, regulatory or statutory in nature to the ConPlan and other related plans and reports.

Working Group Profile

Co-Chairs: Norma Drummond (Westchester County, NY) and John Perry (CPD Director, Atlanta Field Office).

Active Members: Craig Goebel (Gwinnett Co., GA), Donald Hadsell (Sarasota Co., FL), Fran Lunney (Arlington Co., VA), Kristina Rogers (Conifer Realty), Elena Rush (Spartanburg Co., SC), Leslie Suarez (NACCED), and Raymond Webster (Los Angeles Co., CA).

Meeting Dates: Conference Calls were held on July 2 and 17, August 8, 15, and 26. A meeting will be held on September 22 in conjunction with the National Association for County Community and Economic Development (NACCED) Annual Conference in Westchester County, NY.

ComCon staff: Grace Morris

Fast Track Ideas (things upon which quick action may be taken and/or ideas which were agreed to by general consensus of the Working Group):

1. Guidance is requested regarding the CAPER including a sample document. Discussion: County members feel they are without specific instructions.
2. Request that PHA data be shared. Discussion: It would be helpful for planning purposes to have access to this information and would make Grantees feel more comfortable about signing off on letters of consistency for the PHAs.

3. Move ConPlan Tables to an Appendix. Discussion: Current placement of tables incorrectly makes them the centerpiece of the submission. Information should only be included to support the strategies. Some tables (priority needs for example) are confusing to citizens and a useless exercise to Grantees. The ConPlan is too dependent upon narrative which few citizens or elected officials will read. Even Executive Summaries sometimes are burdened down by narrative.
4. Extend submission period for the CAPER. Discussion: The ninety day due date is difficult for many jurisdictions to achieve due to competing interests in the community at the end of a fiscal year.
5. Stop encouraging the use of *Community 2020*. Discussion: Communities are frustrated with having to use *2020* in order to submit their project disks for set up in IDIS, especially when it is an otherwise useless tool in many respects. *Community 2020* also causes a strain on limited resources since it must be placed on a stand-alone computer because the product is not compatible with the current *Windows* operating systems.
6. Universal terminology for income categories. Discussion: It would be helpful to citizens, developers, lenders and staff if all federal housing programs used the same terminology for income categories.
7. Review ConPlan, Annual Plan, CAPER and IDIS to eliminate duplication and inconsistencies. Discussion: Such an analysis and corrections would go a long way towards streamlining and would probably help reduce the length of ConPlans.
8. HUD CPD should establish a Best Practices website. Discussion: Such a site could include a searchable database which would provide immediate assistance to Grantees in a variety of areas including Performance Measurement ideas, utilizing data (beyond census), and effective Citizen Participation. It was suggested that CPD could use this site to share useful tools with Grantees such as templates, charts and graphs which could be easily modified to meet the needs of the local jurisdiction. It was even suggested that HUD could produce icons representative of program activities which could be universally used by Grantees and become known to the public.

This type of "Best Practices" information would be invaluable to communities who struggle with high staff turn over rates and shortages. In addition such models would be helpful for those communities who do not have the capacity to develop such things on their own. Arlington County, VA would be happy to be placed on the CPII Website as a link for a variety of items including performance measurement.

9. Letters of consistency. Discussion: This is often a frustrating and sometimes meaningless exercise. Some nonprofits will go the state for the letter. PHAs come for letters when they have not participated in the ConPlan process. What are the consequences if a letter is denied?

Pilot Recommendations

1. Use of Existing Plans to meet ConPlan requirements. Discussion: Much of the information in the ConPlan is already gathered and submitted by Grantees in other plans. It would streamline the process for communities if they could substitute, by reference, portions of existing plans to meet the ConPlan requirements.

Participant: Gwinnett County, GA.

Lead for Gwinnett, County, GA., - Craig Goebel. HUD Sponsor – John Perry, CPD Director, Atlanta, GA.

For this pilot it would mean utilizing State-Mandated Comprehensive Plan to meet ConPlan requirements. The State of Georgia's Local Comprehensive Plans has similar types of population, housing, economic data, capital and other needs identified as the HUD-mandated Consolidated Plan. The Gwinnett County Comprehensive Plan is a 20-year plan which receives annual updates.

Goal: to "test" if it is possible to satisfy ConPlan requirements through existing plans. This approach would make the Plan more meaningful to the Housing and Community Development Program and to the Planning and Development Department and it would streamline the ConPlan process for the County.

2. Allowing Communities to develop their own ConPlan format. Discussion: Counties would like the option of determining how best to convey the information to their citizens and HUD. The amount of narrative currently suggested in the ConPlan Guidelines is overwhelming. Few Plans actually are read. The Counties suggest that HUD allow them more freedom with the format of the ConPlan. Primarily they believe that better charts and tables would be more useful and interesting to citizens and elected officials. This alternative format could even be tested on the Annual Plan as well.

A potential alternative may be found in Westchester County, NY. Westchester produced a study called Megatrends. The study focuses on a few key factors which will impact the community over the next twenty years. One component is Housing. The information uncovered from this study was used to produce a dynamic PowerPoint presentation utilizing comparison charts and graphs. The presentation also discusses briefly the steps that will be taken to address the identified issues. The presentation is available on the Westchester

County website (www.westchesterdgo.com/planning/megatrends). The presentation can be utilized in a variety of ways including as part of the Citizen Participation process. The Working Group believes that a similar product could in fact replace the pages and pages of paper now being submitted to HUD for the ConPlan.

Performance Measurement

1. National Performance. Discussion: The group agreed that most Grantees do several common things with their funds (homeowner rehab, public services slum and blight removal) which could be reported upon at a national level but they do not want nationally established goals.
2. CAPER. Discussion: The development of a matrix could be an ideal solution to meeting performance measurement goals, if it is easy for HUD and the public to follow and ties back to the ConPlan and the Action Plan. It was suggested that sharing a sample CAPER document would be more helpful to the Grantees than a checklist. It was agreed that ultimately CAPER submissions should be completed on-line.
3. Outcome Reporting Burdens. Discussion: Counties are concerned with the impact of outcome based reporting upon their already stretched staffs. Outcome reporting requires a great deal of tracking and follow-up. It can be a labor intensive effort depending upon the activity. Grantees also feel that outcome based reporting does not easily lend itself to the aggregation of information which could be presented to OMB/Congress in a comprehensive manner.

General Discussion Ideas

1. HUD is notoriously late with grant agreements. Discussion: This continues to be a concern in many communities especially when Grantees are being held to timeliness standards on CDBG. HUD needs to determine what if anything can be done to improve the existing system.
2. Strategies. Discussion: Members questioned the usefulness of the various Strategies (Anti-poverty, CD Non-Housing) and/or their appropriateness as part of the ConPlan. Advocates are concerned about reducing requirements just to make it an easier document for the Grantees to prepare in order to claim it has been streamlined.
3. Data. Discussion: Concerns were expressed by all members about the reliance on census data and the ability of localities to develop their own data. It was suggested that HUD offer guidance on the utilization of already existing forms of data. It was also suggested that HUD provide better guidance to communities on what to do when the most recent census data is not available

in time for their ConPlan submission. Advocates are concerned that many Grantees are too dependent upon the census data.

4. Term and submission cycle of the ConPlan. Discussion: For Urban Counties, who are required to renew their cooperation agreements every three years, a six-year plan would probably make the most sense. Ideally, jurisdictions should be able to determine for themselves the most appropriate term for their plans given that annual plans have to be completed each year under which updates can be submitted. Advocates raised concerns about changing the term for submission and the length of the Plan.

Issues raised by the County Working Group already being addressed by HUD

There is a need for some immediate guidance on areas where confusion seems to exist currently, especially between Field Offices and among Reps. For example, do IDIS prints have to be submitted to the Field with the CAPER submission? Can a community submit a ten-year plan? In response to similar issues raised by all of the CPIO Working Groups, HUD HQ is currently in the process of finalizing a "Q and A" which will be made available to Field Offices and Grantees.

There continue to be questions raised about what is regulatory and what is statutory in the Consolidated Plan. In response HUD HQ is developing an annotated ConPlan indicating such information about each requirement.

Conclusion

Overall most members of the County Working Group find the ConPlan process to be useful. It provides an opportunity to comprehensively analyze a community's needs. For many members, the ConPlan is a "living" document, utilized when making and justifying funding decisions.

While HUD needs to make adjustments to the ConPlan, Annual Plan, IDIS and CAPER, they should not start over. HUD specifically needs to complete enhancements to IDIS in a timely manner and provide guidance on the CAPER. Grantees do not mind reporting on their performance and agree that such efforts are worthwhile. They hope that such efforts can be undertaken in ways that do not increase their reporting burdens.

CPD/HUD's next major step should be to better utilize technology to link ConPlan, Annual Plan, and CAPER and develop a completely web-based system for all required planning and reporting. This of course would go a long way towards achieving the streamlining and performance outcome measures that HUD is seeking.